

1 Harry Shulman, Esq. (SBN 209908)
2 **SHULMAN LAW**
3 44 Montgomery Street, Suite 3830
4 San Francisco, California 94104
5 Telephone: (415) 901-0505
6 Facsimile: (866) 422-4859
7 harry@shulmanlawfirm.com

8 Counsel for Plaintiffs

9
10 **UNITED STATES DISTRICT COURT**
11
12 **NORTHERN DISTRICT OF CALIFORNIA**
13

14 **ANTHONY PETRU and MARCUS MATHIS,**
15 **Individually and on behalf of all others**
16 **similarly situated,**

17 Plaintiffs,

18 v.

19 **APPLE INC.; HACHETTE BOOK GROUP,**
20 **INC.; HARPERCOLLINS PUBLISHERS,**
21 **INC.; MACMILLAN PUBLISHERS, INC.;**
22 **PENGUIN GROUP (USA) INC.; and SIMON**
23 **AND SCHUSTER, INC.**

24 Defendants.

Case No. 3:11-CV-03892 EMC

CLASS ACTION

25 **EUGENIA RUANE-GONZALES, and all**
26 **others similarly situated,**

27 Plaintiffs,

28 v.

APPLE INC.; HACHETTE BOOK GROUP,
INC.; HARPERCOLLINS PUBLISHERS,
INC.; MACMILLAN PUBLISHERS, INC.;
PENGUIN GROUP (USA) INC.; SIMON
AND SCHUSTER, INC.; and DOES I-X,

Defendants.

Case No. 4:11-CV-04500 LB

CLASS ACTION

DECLARATION OF HARRY SHULMAN
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED [L.R. 3-12]

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I, Harry Shulman, declare as follows:

1. I am a member in good standing of the California State Bar and an attorney at Shulman Law, counsel of record for Plaintiff in *Eugenia Ruane-Gonzales v. Apple, Inc. et al.*, Case No. 3:11-CV-03954-NC (“*Ruane-Gonzales*”). I make this declaration based on my personal knowledge, and if called to testify to the contents, I could and would competently do so.

2. Attached as Exhibit A is a true and correct copy of the class action complaint filed on August 9, 2011 in *Petru et al. v. Apple, Inc. et al.* Case No. 3:11-CV-03892 EMC, and assigned to the Honorable Edward M. Chen.

3. Attached as Exhibit B is a true and accurate copy of the class action complaint filed on September 9, 2011 in *Ruane-Gonzales v. Apple, Inc. et al.*, Case No. 4:11-CV-04500 LB.

4. I have discussed this motion with defense counsel Richard Horvath, who has stated that defendants do not oppose this motion.

I declare under penalty of perjury that the foregoing facts are true and correct and that this declaration was executed on this 4th day of September, 2011 in San Francisco, California.

Dated: October 4, 2011.

By: _____

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DECLARATION OF HARRY SHULMAN IN SUPPORT OF ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED [L.R. 3-12]